



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

February 11, 2019

Via Delivery as Email-attachment to Prashant.gupta@honeywell.com and Certified Mail

Mr. Prashant K. Gupta
Honeywell
115 Tabor Road
Morris Plains, NJ 07950

Re: LCP Chemicals National Priorities List Site, Brunswick, Glynn County, GA

Dear Mr. Gupta:

The purpose of this letter is to document the discussions between Honeywell International, Inc. (Honeywell), Georgia Environmental Protection Division (GAEPD), and the U.S. Environmental Protection Agency (EPA) on February 6, 2019. The meeting was convened to discuss the preliminary results of the groundwater investigation for Operable Unit (OU) 2 – the Cell Building Area and Site Groundwater. In addition, Honeywell requested an opportunity to discuss concerns about the comments from the EPA dated December 6, 2018 on the Draft Development and Screening of Remedial Action Alternatives for OU3 – Upland Soils. Honeywell was unable to have discussions with the EPA during the federal government shutdown that ended January 25, 2019, resulting in a delay in revising the document.

CBP Removal Action- Cell Building area delineation

After presenting the results of the most recent cell building area investigation, Honeywell proposed to conduct a fourth round of CO₂ injections to lower the pH of groundwater in the cell building area in accordance with the Agreement on Consent for the Caustic Brine Pool. Honeywell will submit a draft technical memorandum describing the proposed work which they hope to perform as early as March. The EPA and GAEPD will review the document as quickly as possible. Honeywell agreed to also evaluate the “bounding” of the newly detected northern lobe of the CBP to east and west of the current direct push locations to determine the extent of the lobe and to place sparge wells accordingly. EPA and GAEPD agreed that the injection work can move ahead in the Spring of 2019 using the agreed procedures of previous workplans. The injections are anticipated to last through December 2019, with a follow-up post monitoring event in March 2020.

OU2 – the Cell Building Area and Site Groundwater

Honeywell committed to provide, in March 2019, data summaries (including validation) for groundwater sampling conducted in 2017 and 2018. It is EPA’s expectation that the summaries will include coring information and validated soil sampling results and that the data will feed into the forthcoming Remedial Investigation Report for OU2.

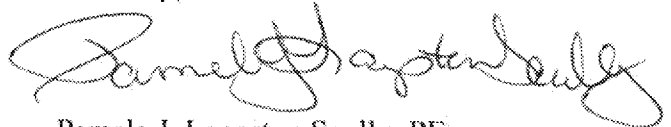
To further inform the OU2 groundwater condition, it was agreed that the CBP phase 4 work be completed, prior to performing the RI/FS. The most optimistic date for completion of the OU2 RI is December 2020.

OU3 – Upland Soils

A discussion about the EPA's comments was held and a path forward to resolve the comments. The primary issues were 1) the data used by the EPA to determine hot spots may have included samples for depths greater than the biologically active zone, and 2) the reference to an Oregon Department of Environmental Quality (ODEQ) workgroup report that has not been approved or incorporated into the EPA's risk assessment process. Honeywell agreed to respond to the comment with an explanation about which data should be excluded from the evaluation and why. Honeywell also agreed to clarify that the ODEQ document is not an approved EPA risk assessment methodology; the conclusions should be valid and reasonable without the ODEQ methodology for evaluating industrial site data. The EPA requested that Honeywell submit the revised OU3 submittal as a Feasibility Study (FS) instead of a technical memorandum in order to advance the Superfund process, and the EPA agreed to allow Honeywell 45 days from the receipt of this letter for preparation of the FS document.

If you have any questions or concerns, please contact me at (404)562-8935.

Sincerely,

A handwritten signature in black ink, appearing to read "Pamela J. Langston Scully". The signature is fluid and cursive, with the first name "Pamela" being the most prominent.

Pamela J. Langston Scully, PE
Remedial Project Manager
Superfund Restoration and Construction Section

cc: J. McNamara, GAEPD